9119/RHD CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP 61 Broadway, Suite 3000 New York, New York 10006-2802 (212)344-7042 Attorneys for Defendant Hyundai Merchant Marine Co. Ltd.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

COMMERCIAL METALS COMPANY,

Plaintiff,

- against -

M.V. CHRYSOULAS, in rem, HER ENGINES, TACKLE, APPAREL, ETC., EXPERT INVESTMENTS, ORDER SHIPPING CO., LTD., and HYUNDAI MERCHANT MARINE CO., LTD., IN PERSONAM,

Defendants.

08 Civ. 0075 (DAB)

ANSWER TO CROSS-CLAIMS

Defendant Hyundai Merchant Marine Co. Ltd. ("HMM") by its attorneys, Cichanowicz, Callan, Keane, Vengrow & Textor, LLP, answering the cross-claims of defendants Order Shipping Co. Ltd. and Expert Investments, alleges upon information and belief as follows:

- 1. Denies the allegations of paragraph 32.
- 2. Denies the allegations of paragraph 33.
- 3. Denies the allegations of paragraph 34.
- Denies knowledge or information sufficient to form a belief as to the truth 4. of the allegations of paragraph 35.

WHEREFORE, HMM prays for:

(a) Judgment dismissing the cross-claims;

- (b) An award of all costs including attorneys' fees; and
- (c) Such other and further relief as this Court may deem just and proper.

Dated: New York, New York April 15, 2008

> Respectfully submitted, CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP Attorneys for Defendant Hyundai Merchant Marine Co. Ltd.

By: s/Randolph H. Donatelli
Randolph H. Donatelli (RD-5359)
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To: Fein & Jakab
The Woolworth Building
233 Broadway, Suite 930
New York, NY 10279
(212) 732-9290

Freehill, Hogan & Mahar 80 Pine Street, 24th Floor New York, New York 10005-1759 (212) 425-1900

CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL AND BY ECF

The undersigned declares under penalty of perjury that the following is true and correct:

- 1. I am over the age of eighteen years and I am not a party to this action.
- 2. On April 15, 2008, I served a complete copy of Defendant Hyundai Merchant Marine Co. Ltd.'s Answer to Cross-Claims, by regular U.S. mail and by ECF, to the following attorneys at their ECF registered address and at the following address:

To: Fein & Jakab
The Woolworth Building
233 Broadway, Suite 930
New York, NY 10279
(212) 732-9290
Attn.: Peter Jakab, Esq.

Freehill, Hogan & Mahar 80 Pine Street, 24th Floor New York, New York 10005-1759 (212) 425-1900 Attn.: Bill Juska, Esq.

> MMULQI/SU(IMMU) Jennifer Scianna

DATED:

April 15, 2008

New York, New York